



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

JUN 04 2013

ACTION MEMORANDUM AMENDMENT #2

SUBJECT: Request for an Increase in Project Ceiling at the West Highway 6 & Highway 281 Site (a.k.a. Dana Corp), Adams County, Hastings, Nebraska

FROM: Randy Schademann, On-Scene Coordinator
Planning and Preparedness North Section *RPS*

THRU: Dave Williams, Chief
Planning and Preparedness North Section *Dave Williams*

TO: Cecilia Tapia, Director
Superfund Division

Site ID# A76N (RV001, OU #00)

I. PURPOSE

The purpose of this Action Memorandum Amendment is to request approval for an increase in the project ceiling for a fund-lead, time-critical removal action at the West Highway 6 & Highway 281 Site (a.k.a. Dana Corp or the Site), Adams County, Hastings, Nebraska. The scope has not changed for the Site from the Action Memorandum approved on July 6, 2006 (Attachment #1), or the Action Memorandum Amendment approved on May 17, 2010 (Attachment #2), which proposed the U.S. Environmental Protection Agency's (EPA's) assumption of operation of existing soil vapor extraction (SVE) and groundwater extraction systems. Activities in this action will include enhancements or system modifications, scheduled sampling to determine system efficiency, the operational costs of the systems (i.e., electricity, gas, water), and daily systems checks.

The aforementioned systems will be operated under this Action Memorandum Amendment until such time as the Remedial Investigation/Feasibility Study (RI/FS) is completed, a Record of Decision (ROD) is finalized and on-site construction is begun. It is anticipated that construction of the selected remedy will be in early 2014.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID#: NEN000704738
Nationally Significant/
Precedent Setting: No
Removal Category: Time-critical

30284840

Superfund



A. Site Description

1. Removal Site Evaluation

See previously approved Action Memorandum dated July 6, 2006.

2. Physical Location

ETDS # 0 WJL

See previously approved Action Memorandum dated July 6, 2006.

3. Site Characteristic

See previously approved Action Memorandum dated July 6, 2006.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

See previously approved Action Memorandum dated July 6, 2006.

5. NPL Status

See previously approved Action Memorandum dated July 6, 2006.

6. Maps, Pictures and other Graphic Representations

See previously approved Action Memorandum dated July 6, 2006.

B. Other Actions to Date

1. Previous Actions

See previously approved Action Memorandum dated July 6, 2006.

Also, since July 2006, the following actions have been taken:

- An air stripper was installed to treat the groundwater (previously, the water was being discharged to Hastings sewer for treatment at the utilities plant). Treated water is now being discharged to an on-site pond via an underground pipe that was installed as part of this action.
- The aforementioned pond was excavated to allow for additional storage capacity and facilitate groundwater infiltration.
- Sampling of the monitoring well network (42 wells) roughly three times a year. Sampling of the SVE and groundwater extraction wells (8 wells total) roughly quarterly.
- Almost continuous operation of the SVE and groundwater extraction system. Several pumps and motors were replaced in the groundwater extraction network and a hydrant was added to one well to facilitate sampling.
- Almost daily system checks by a local engineer.

2. Current Actions

This Action Memorandum Amendment will allow for the continued operation and monitoring of the SVE and groundwater extraction systems.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

See previously approved Action Memorandum dated July 6, 2006.

2. Potential for Continued State/Local Response

See previously approved Action Memorandum dated July 6, 2006.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

See previously approved Action Memorandum dated July 6, 2006.

IV. ENDANGERMENT DETERMINATION

See previously approved Action Memorandum dated July 6, 2006.

V. Exemption from Statutory Limits

12-Month Exemption

See previously approved Action Memorandum dated July 6, 2006.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

This Action Memorandum Amendment will allow for the continued operation and monitoring of the SVE and groundwater extraction systems. The system, which has been in operation since 2007, has extracted almost a ton of chlorinated solvents. The removal of that contamination has restricted the growth of the plume thereby protecting down gradient ground water wells.

2. Contribution to Remedial Performance

See previously approved Action Memorandum dated July 6, 2006.

3. Description of Alternative Technologies

See previously approved Action Memorandum dated July 6, 2006.

4. Engineering Evaluation/Cost Analysis

See previously approved Action Memorandum dated July 6, 2006.

5. Applicable or Relevant and Appropriate Requirements (ARARs)

Federal

See previously approved Action Memorandum dated July 6, 2006.

State

See previously approved Action Memorandum dated July 6, 2006.

6. Project Schedule

Approval of this Action Memorandum Amendment will allow for uninterrupted operation and maintenance of the systems. The additional costs will cover utility cost, systems checks and sampling costs for 2 years, if necessary.

B. Estimated Costs

	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Amended Ceiling</u>
Extramural Costs	\$560,000	\$200,000	\$760,000
Extramural Cost Contingency	<u>102,000</u>	<u>20,000</u>	<u>122,000</u>
Extramural Cost Subtotal	\$662,000	\$220,000	\$882,000

EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Refer to the enforcement section for a breakout of these costs.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

There is an Enforcement Addendum for this Site. The Enforcement Addendum was included in the Action Memorandum dated July 6, 2006. For NCP consistency purposes, it is not part of this Action Memorandum Amendment.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$1,305,986.

	<u>Current Project Cost</u>	<u>Proposed Increase</u>	<u>Amended Project Costs</u>
EPA Extramural Costs	\$662,000	\$220,000	\$882,000
EPA Intramural Costs	77,000	20,000	97,000
EPA Indirect Costs (33.40 Percent)	<u>332,328</u>	<u>(5,342)</u>	<u>326,986</u>
Total Costs	<u>\$1,071,328</u>	<u>\$234,658</u>	<u>\$1,305,986</u>

*EPA Indirect rate changed from 44.97 percent to 33.40 percent since the previously approved Action Memorandum, dated May 17, 2010.

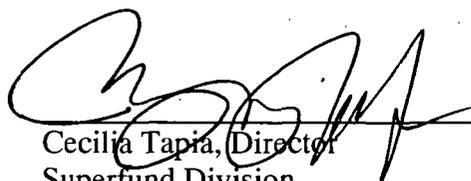
Direct costs include direct extramural and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost-accounting methodology effective October 2, 2000. These estimates do not include prejudgment interest, do not take into account other enforcement costs, including Department of Justice costs and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for addressing the hazardous substances, pollutants or contaminants present at the site. The removal action was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site.

The conditions at the site meet NCP section 300.415(b) criteria for a removal action. If this increase is approved, the removal action ceiling will be \$882,000. These funds will come from the regional removal allowance.

Approved:


 Cecilia Tapia, Director
 Superfund Division

6-4-13
 Date

Attachments

- 1) Action Memorandum approved July 6, 2006
- 2) Action Memorandum Amendment approved May 17, 2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

JUL 07 2006

ACTION MEMORANDUM

SUBJECT: Request for a Removal Action and 12-Month Exemption at the West Highway 6 & Highway 281 Site (a.k.a. Dana Corporation), Adams County, Hastings, Nebraska

FROM: Randy Schademann, On-Scene Coordinator
Emergency Response and Removal Branch *[Signature]*

THRU: Scott Hayes, Chief
Emergency Response and Removal Branch *[Signature]*

TO: Cecilia Tapia, Director
Superfund Division

Site ID#:	A76N
CERCLIS ID#:	NEN000704738
Nationally Significant/ Precedent Setting:	No
Category of Removal:	Time-critical

I. PURPOSE

The purpose of this Action Memorandum is to request funding and document approval of a consistency exemption to the 12-month statutory limitation for removal. The general objective of the proposed removal action described herein for the West Highway 6 & Highway 281 Site (a.k.a. Dana Corporation or the Site), Adams County, Hastings, Nebraska, is the U.S. Environmental Protection Agency's (EPA's) assumption of operation of existing soil vapor extraction (SVE) and ground water extraction systems. Activities in this action will include: assessment of the systems including the need for enhancements or system modifications, sampling to determine efficiency and effectiveness of the system, operational costs of the systems (i.e., electricity, gas, water), additional sampling, and daily systems checks.

The aforementioned systems will be operated under this Action Memorandum until such time as the Remedial Investigation/Feasibility Study (RI/FS) is completed and a Record of Decision (ROD) is finalized. It is anticipated that a ROD will be finalized in 2 years.

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[Redacted Box]

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II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

The Site is located at 1900 Summit Avenue in Hastings' West Industrial Park on the southwestern outskirts of Hastings, Nebraska. Between 1978 and 2002, Dana Corporation utilized chlorinated solvents, including tetrachloroethene (PCE), during manufacturing processes at its Hastings facility.

In 1997 a sample from Hastings' Municipal Well No. 13, approximately 800 feet south-southeast of the former Dana Corporation facility, contained PCE at 17 micrograms per liter ($\mu\text{g/L}$). The Safe Drinking Water Act Maximum Contaminant Level (MCL) for PCE is 5 $\mu\text{g/L}$. The well was subsequently taken off line. Municipal Well No. 14, located approximately 1 mile east-southeast of the former Dana Corporation facility, was found to contain 7.3 $\mu\text{g/L}$ of PCE in 2004. Other commercial and private wells in the vicinity have been found to contain PCE above the MCL.

Numerous on-site investigations have been completed at the former Dana Corporation facility between 1998 and the present including a Preliminary Assessment/Site Investigation (PA/SI) completed by the Nebraska Department of Environmental Quality (NDEQ) in June 2005. Key findings from the investigations included:

- the detection of PCE at 57,000 milligrams per kilogram (mg/kg) in soils;
- the detection of PCE at 182,000 $\mu\text{g/L}$ in ground water near one of the degreasing pits; and
- a PCE plume extends some 2 miles downgradient (east-southeast) of the Site.

A layout of the Site is included as Attachment 1.

2. Physical Location

The Site address is 1900 Summit Avenue, which is in the southwest portion of Hastings, Nebraska. The site is located at 40.5712 North latitude and -98.4090 West longitude. This location is in the southeast quarter of Section 14, Township 7 North, Range 10 West.

3. Site Characteristics

The Site is located on approximately 12.5 acres. Within this acreage is a production/office structure of approximately 154,717 square feet and a 1,400 square-foot metal

building housing the extraction systems. The facility rests on relatively flat terrain. Surface water flow is to the south-southeast to the Little Blue River, which is approximately 8 miles south of Hastings. Depth to ground water at the Site is approximately 97 feet below ground surface (bgs). A silty clay layer of 3 to 5 feet in thickness, encountered at a depth of 115 feet bgs at the Site, separates the aquifer into an upper and intermediate zone. The intermediate zone is heavily utilized in the area for agricultural, municipal, commercial, and domestic uses. The continuity of the silty clay layer remains unresolved. Ground water flow in the area is generally east-southeast.

The Site lies within the Hastings' West Industrial Park on the extreme southwest portion of the city. The immediate area is industrial with undeveloped farm land to the west. The nearest residential development is approximately 0.6 miles to the east.

Dana Corporation's Hastings facility manufactured piston rings for internal combustion engines from 1978 until 2002. Three vapor degreasing units, using PCE as a solvent, were used to clean the piston rings following various wet machining operations. The degreasers were housed in concrete pits and company officials have acknowledged that one of the degreasers was found leaking in 1988 and that occasional overfilling of the units resulted in spillage. The PA/SI identified a relatively narrow PCE plume that extends almost 2 miles downgradient of the Site.

Dana Corporation initiated source control measures including a SVE system and a ground water extraction system. The SVE consists of five extraction wells with the effluent stream being treated by a catalytic oxidation system. The ground water remediation system encompasses four extraction wells with the untreated effluent discharged to the Hastings Utilities sanitary sewer system. In addition, Dana Corporation connected three private entities to the city's water system after they were identified as using individual wells that exceeded the MCL for PCE.

Dana Corporation is in the process of filing for bankruptcy and has indicated they will discontinue operation of the SVE and ground water extraction systems in early June 2006.

4. Release or Threatened Release into the Environment
of a Hazardous Substance, or Pollutant or Contaminant

PCE has been detected in municipal, industrial, and private drinking water wells attributable to the Site. This compound is listed as a hazardous substance pursuant to 40 C.F.R. § 302.4. As such, it is a "hazardous substance" as defined in Section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9601(14).

PCE is migrating into the local ground water system. Area ground water provides drinking water to the city of Hastings (approximate population of 24,000). PCE has been detected above its MCL in two of the municipal wells.

5. NPL Status

The Site was listed on the National Priorities List (NPL) in April 2006.

6. Maps, Pictures and Other Graphic Representations

A Site map is included as Attachment 1.

B. Other Actions to Date

1. Previous Actions

1997: Municipal Well No. 13 identified as containing PCE at 17 $\mu\text{g/L}$.
The well was subsequently taken off line.

1998: Sampling conducted by Dana Corporation reveals PCE contamination in on-site soil and ground water samples.

2003: Dana Corporation entered into Memorandum of Agreement with NDEQ.

2003/2004: Dana Corporation installs SVE and ground water extraction systems.

2004: Municipal Well No.14 identified as containing PCE at 7.3 $\mu\text{g/L}$.
Water from this well is blended.

2004/2005: NDEQ submits a Request for Federal Assistance.

2005: PA/SI completed by NDEQ that indicates PCE contamination in Municipal Wells Nos. 13 and 14, as well as contamination in several commercial and private wells, attributable to the Site.

2005: The Site is proposed for listing on NPL.

2006: Dana Corporation notifies EPA of intent to file for bankruptcy.

2006: Final NPL Listing.

2. Current Actions

Dana Corporation has indicated it will cease operations of the SVE and ground water extraction systems in early June 2006.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

See summary above in B1.

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2. Potential for Continued State/Local Response

The NDEQ will be kept apprised of EPA actions and may be requested to provide sampling and/or monitoring assistance.

D. Community Involvement Activities

The Administrative Record supporting this Action Memorandum will be placed in a local repository and the EPA Region 7 Records Center. The EPA will keep the city of Hastings and NDEQ informed of all actions performed by Dana Corporation. Future public meetings will be scheduled as developments warrant.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT,
AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

Site conditions pose a significant threat to public health and welfare which meet the criteria for response action under 40 C.F.R. § 300.415(b)(2) of the National Contingency Plan (NCP), which are described as follows:

1. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.
[40 C.F.R § 300.415(b)(2)(i)]

Municipal Well No. 13, located approximately 800 feet south-southeast of the Site, was placed on emergency use in 1997 due to elevated levels of contaminants including PCE at 17 $\mu\text{g/L}$. In April 2004, NHHSS found elevated levels of PCE (7.3 $\mu\text{g/L}$) in Municipal Well No. 14 which is located approximately one mile east of the former Dana Corporation facility.

PCE is a colorless, nonflammable, chlorinated ethane with an ether-like odor and is used in the dry cleaning industry, for metal degreasing, textile processing, cleaning electronic components, etc. Human exposure to PCE occurs through ingestion and inhalation. PCE is readily absorbed through the lungs. PCE exposure depresses the central nervous system causing vertigo, confusion, tremors, numbness, and inebriation-like symptoms. Kidney impairment and hepatotoxic effects also result from exposure to PCE. Experimental evidence indicates that PCE produces liver cancer in mice and is also a mutagen. Some experimental evidence has shown PCE to bioaccumulate in organisms at levels of up to 100X the concentration in the surrounding water. PCE will biodegrade under anaerobic conditions in the following sequence: PCE to trichloroethene to 1,2,-dichloroethene to vinyl chloride. PCE is more toxic to aquatic life than other chlorinated methanes, ethanes, and ethenes.

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WHW6

2. Actual or potential contamination of drinking water supplies or sensitive ecosystems. [40 C.F.R § 300.415(b)(2)(ii)]

Municipal Well No. 13, located approximately 800 feet south-southeast of the Site, was placed on emergency use in 1997 due to elevated levels of contaminants including PCE at 17 $\mu\text{g/L}$. In April 2004, sampling performed by NHHSS detected elevated levels of PCE (7.3 $\mu\text{g/L}$) Municipal Well No. 14 which is located approximately one mile east of the former Dana Corporation facility.

3. The availability of other appropriate federal or state response mechanisms to respond to the release. [40 C.F.R. § 300.415(b)(2)(vii)]

NDEQ has referred the Site to EPA for action. There are no other state or federal authorities that are able to take the necessary immediate actions.

4. Other situations or factors that may pose threats to public health or welfare of the United States or the environment. [40 C.F.R. § 300.415(b)(2)(viii)]

The extent of PCE contamination in the ground water has not yet been fully determined. Thus, the full extent of the impact to the drinking water supply is unknown.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances or pollutants or contaminants from the Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

12-Month Exemption

Emergency Exemption:

A. There is an immediate risk to the public health or welfare or the environment from the chlorinated solvent contamination that currently exists in the ground water that underlies the Site and the associated plume.

B. Continued response actions are immediately required to prevent, limit, or mitigate an emergency. Because of Dana Corporation's impending bankruptcy and cessation of operation of the SVE and ground water extraction systems, the release from the Site would increase and could potentially impact additional private and municipal wells. It is anticipated that the ongoing assessment of the Site and determination of the final remedy will take more than one year; therefore, necessitating an exemption from the one-year statutory limit on removal actions.

C. Assistance will not otherwise be provided on a timely basis. Neither the state nor county government has access to or the resources necessary to mitigate this threat. The community is relying on the federal government for assistance on this matter.

Consistency Exemption:

The response action will otherwise be appropriate and consistent with the future remedial actions to be taken.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The objective of this time-critical removal action is to assume operation of the SVE and ground water extraction systems. Activities included in this action will include assessment of the systems, including enhancements or system modifications, sampling to determine efficiency and effectiveness of the systems, operational costs of the systems (i.e., electricity, gas, water), additional sampling, and daily systems checks.

2. Contribution to Remedial Performance

The Site is currently listed on the NPL. The proposed action will mitigate the immediate threats posed by the contamination at the Site. After the above interim removal actions are implemented, a longer-term remediation plan will be formulated by EPA. This removal action will retard the continued movement of the solvent plume to mitigate adverse affects to human health while subsequent investigations can better determine the long-term solution to the contamination.

3. Description of Alternative Technologies

Past operational expenses have included approximately \$230,000/year for discharge of the untreated ground water to the Hastings Utilities sanitary sewer system. The EPA has approached Hastings Utilities for relief. One function of this Action Memorandum will be to investigate alternative treatment technologies (e.g., air stripping) to reduce future disposal costs.

4. Engineering Evaluation/Cost Analysis (EE/CA)

An EE/CA will not be prepared since this is a time-critical removal action. The proposed response action addresses the immediate threats at the site.

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WHW6

5. Applicable or Relevant and Appropriate Requirements (ARARs)

Federal

Occupational Safety and Health Act Standards - 29 C.F.R. Part 1910 and Parts 1926.20 - 1926.26, will be applicable to all actions.

Clear Air Act, National Ambient Air Quality Standards - 40 C.F.R. §§ 50.6 and 50.12 are the national ambient air quality standard for air quality pertaining to particulate matter. The standards and the method of measurement are discussed in these sections. Engineering controls (e.g., dust control) will be used at the Site to achieve those standards.

State

EPA requested that NDEQ identify requirements that the state of Nebraska wanted EPA to consider as potential state ARARs for this removal action. To qualify as state ARARs, these requirements must be (1) promulgated, (2) identified by the state within the time period specified in this letter, and (3) more stringent than federal requirements.

6. Project Schedule

Primary On-site activities can commence within 7 days of approval of this action memorandum.

B. Estimated Costs

Extramural Costs

Removal Costs	\$ 410,000
20% Contingency	<u>82,000</u>
Removal Ceiling	\$ 492,000

EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Project Ceiling for this removal action. Refer to the Enforcement Section for a breakout of these costs.

VII. OUTSTANDING POLICY ISSUES

None.

SF1014609
WHW6

VIII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

The proposed actions for the Site should be taken immediately. Should these actions be delayed, the potential threats to human health and the environment will increase.

IX. ENFORCEMENT

Intramural Cost:

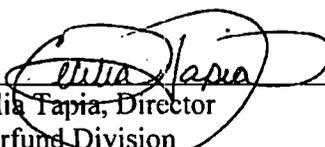
EPA Direct Costs	\$	50,000
EPA Indirect Costs (50.69% of all costs)	\$	<u>274,740</u>
Subtotal Intramural Costs	\$	324,740
 TOTAL PROJECT COSTS	\$	 816,740

Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs consistent with the full cost-accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of the removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

X. RECOMMENDATION

This decision document represents the selected removal action for the Site, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP Section 300.415(b) criteria for a removal and I recommend your approval of the proposed removal action. The removal project ceiling, if approved, will be \$492,000 and will be funded from the Regional Removal Allowance.



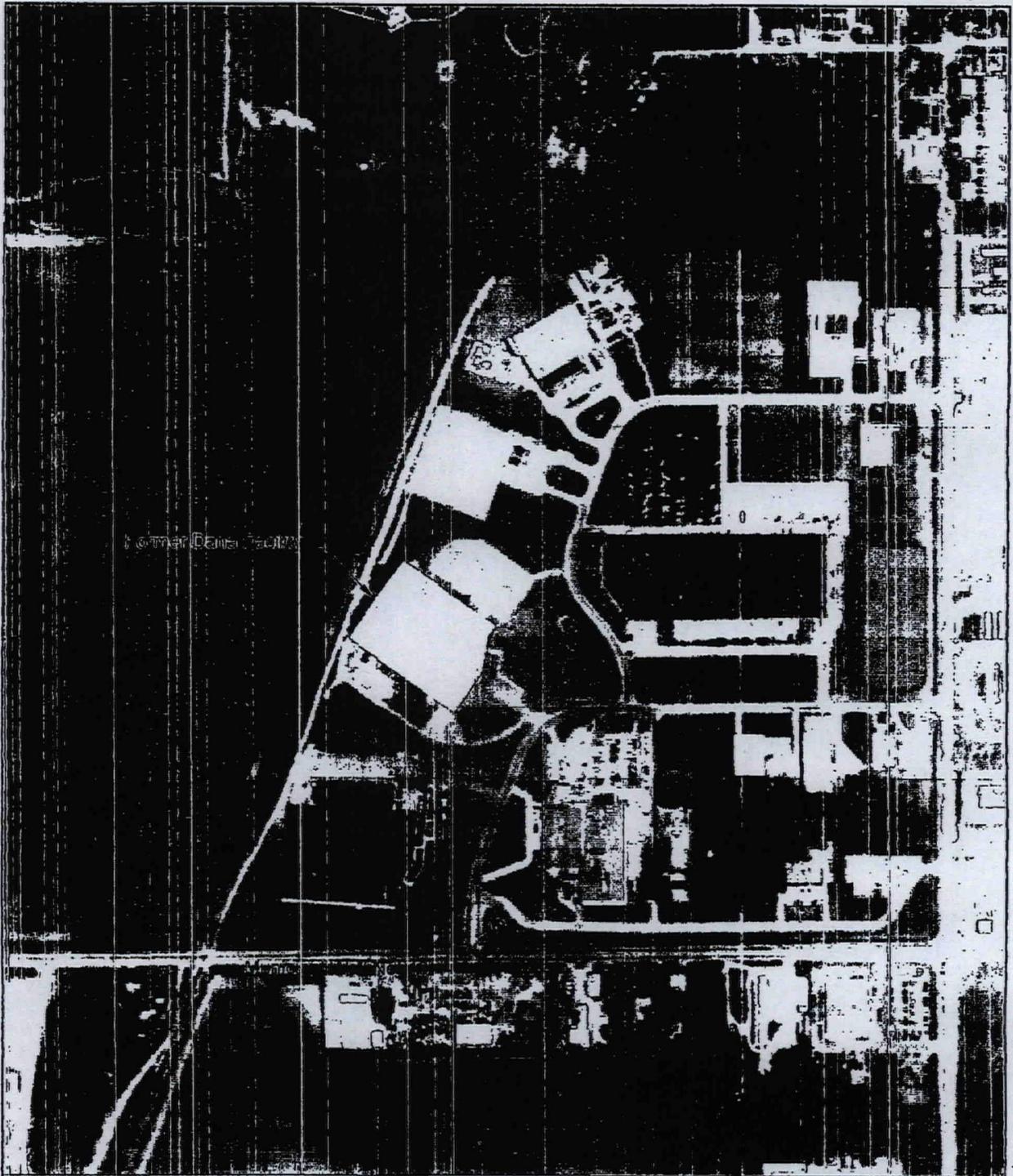
Cecilia Tapia, Director
Superfund Division
Region VII

7/6/00

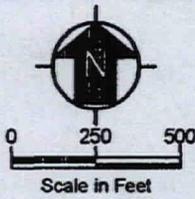
Date

Attachments

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Source: Hastings West, NE NE DOQQ, 2003 PSA Imagery



West Highway 6 and Highway 281 Site
Hastings, Nebraska

Figure
Site Aerial

 Tetra Tech EM Inc.

Date: 05/1/08 Drawn By: Roger Stull Project No: 18004.L06.0035.000

WHW6
SF1014610



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MAY 17 2010

ACTION MEMORANDUM AMENDMENT

SUBJECT: Request for an Increase in Project Ceiling at the West Highway 6 & Highway 281 Site (a.k.a. Dana Corp), Adams County, Hastings, Nebraska

FROM: Randy Schademann, On-Scene Coordinator
Planning and Preparedness North Section *RS*

THRU: Don Lininger, Chief
Planning and Preparedness North Section *DL*

TO: Cecilia Tapia, Director
Superfund Division

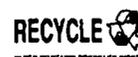
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Superfund

Site ID#: A76N
CERCLIS ID#: NEN000704738
Nationally Significant/
Precedent Setting: No
Category of Removal: Time-critical

I. PURPOSE

The purpose of this Action Memorandum Amendment is to request approval for an increase in the project ceiling for a fund-lead, time-critical removal action at the West Highway 6 & Highway 281 Site (a.k.a. Dana Corp or the Site), Adams County, Hastings, Nebraska. The scope has not changed for the Site from the Action Memorandum approved on July 6, 2006, which proposed the U.S. Environmental Protection Agency's (EPA's) assumption of operation of existing soil vapor extraction (SVE) and groundwater extraction systems. Activities in this action will include enhancements or system modifications, scheduled sampling to determine system efficiency, the operational costs of the systems (i.e., electricity, gas, water), and daily systems checks.

The aforementioned systems will be operated under this Action Memorandum Amendment until such time as the Remedial Investigation/Feasibility Study (RI/FS) is completed, a Record of Decision (ROD) is finalized, and on-site construction is begun. It is anticipated that construction of the selected remedy will be in early 2011.



II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

See previously approved Action Memorandum dated July 6, 2006.

2. Physical Location

See previously approved Action Memorandum dated July 6, 2006.

3. Site Characteristic

See previously approved Action Memorandum dated July 6, 2006.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

See previously approved Action Memorandum dated July 6, 2006.

5. NPL Status

See previously approved Action Memorandum dated July 6, 2006.

6. Maps, Pictures and other Graphic Representations

See previously approved Action Memorandum dated July 6, 2006.

B. Other Actions to Date

1. Previous Actions

See previously approved Action Memorandum dated July 6, 2006.

Also, since July 2006, the following actions have been taken:

- An air stripper was installed to treat the groundwater (previously, the water was being discharged to Hastings sewer for treatment at the utilities plant). Treated water is now being discharged to an on-site pond via an underground pipe that was installed as part of this action.
- The aforementioned pond was excavated to allow for additional storage capacity and facilitate groundwater infiltration.
- Sampling of the monitoring well network (42 wells) roughly three times a year. Sampling of the SVE and groundwater extraction wells (8 wells total) roughly quarterly.

- Almost continuous operation of the the SVE and groundwater extraction system. Several pumps and motors were replaced in the groundwater extraction network and a hydrant was added to one well to facilitate sampling.
- Almost daily system checks by a local engineer.

2. Current Actions

This Action Memorandum Amendment will allow for the continued operation and monitoring of the SVE and groundwater extraction systems.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

See previously approved Action Memorandum dated July 6, 2006.

2. Potential for Continued State/Local Response

See previously approved Action Memorandum dated July 6, 2006.

D. Community Involvement Activities

See previously approved Action Memorandum dated July 6, 2006.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

See previously approved Action Memorandum dated July 6, 2006.

IV. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

This Action Memorandum Amendment will allow for the continued operation and monitoring of the SVE and groundwater extraction systems.

2. Contribution to Remedial Performance

See previously approved Action Memorandum dated July 6, 2006.

3. Description of Alternative Technologies

See previously approved Action Memorandum dated July 6, 2006.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

Federal

See previously approved Action Memorandum dated July 6, 2006.

State

See previously approved Action Memorandum dated July 6, 2006.

5. Project Schedule

Approval of this Action Memorandum Amendment will allow for uninterrupted operation and maintenance of the systems.

B. Estimated Costs

	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Amended Ceiling</u>
Extramural Costs	\$ 410,000	\$ 150,000	\$ 560,000
Extramural Cost Contingency	<u>82,000</u>	<u>20,000</u>	<u>102,000</u>
Subtotal, Extramural Cost	\$ 492,000	\$ 170,000	\$ 662,000

EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Refer to the enforcement section for a breakout of these costs.

V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

See previously approved Action Memorandum dated July 6, 2006.

VI. EXEMPTION FROM STATUTORY LIMITS

12-Month Exemption

See previously approved Action Memorandum dated July 6, 2006.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

See attached Confidential Enforcement Addendum for this site in the previously approved Action Memorandum dated July 6, 2006. For NCP consistency purposes, it is not part of this Action Memorandum Amendment.

The total EPA costs for this removal action based on full cost-accounting practices are estimated to be:

	<u>Current</u> <u>Project Costs</u>	<u>Proposed</u> <u>Increase</u>	<u>Amended</u> <u>Project Costs</u>
EPA Intramural Costs	\$ 50,000	\$ 27,000	\$ 77,000
EPA Extramural Costs	492,000	170,000	662,000
EPA Indirect *	<u>274,740</u>	<u>57,588</u>	<u>332,328</u>
Total Project Costs	\$816,740	\$254,588	\$1,071,328

* Indirect rate changed from 50.60 percent to 44.97 percent since the previously approved Action Memorandum dated July 6, 2006; direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs consistent with the full cost-accounting methodology effective October 2, 2000. These estimates do not include prejudgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of the removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for addressing the hazardous substances, pollutants, or contaminants present at the site. The removal action was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site.

The conditions at the site meet NCP section 300.415(b) criteria for a removal action. If this increase is approved, the removal action ceiling will be \$662,000. These funds will come from the regional removal allowance.

Approved:



Cecilia Tapia, Director
Superfund Division
Region VII

5/17/10

Date